



JOHN MUIR
PARTNER

DIRECT DIAL: (713) 980-1715
jmuir@bakerwotring.com

August 22, 2018

VIA Electronic Mail

T. Mitchell Hudson, Jr.
Division of Legislation and Regulations
U.S. Department of Transportation
Maritime Administration
Second Floor, West Building
1200 New Jersey Ave., SE, W24-233
Washington, DC 20590
foia.marad@dot.gov

RE: Open Records Request – Texas Gulf Terminals Deepwater Port License Application

Dear Mr. Hudson:

In accordance with the provisions of the Freedom of Information Act, 5 U.S.C. § 552, Baker · Wotring LLP hereby requests the prompt production and disclosure of any and all memoranda, lists, correspondence, and other documents and records, whether draft, preliminary, interim or final, as well as any other related documentation in electronic format, in the possession, custody or control of the Maritime Administration identifying, evidencing or related to Texas Gulf Terminals, Inc. (TGT), the TGT application for a Deepwater Port License (Docket No. MARAD 2018-0114), and any other related documents.

This request is for all public information in whatever media it may be kept and in whatever form including, but not limited to, any book, paper, letter, document, e-mail, Internet posting, text message, instant message, other electronic communication, printout, photograph, film, tape, microfiche, microfilm, sound recording, map, and drawing and a voice, data, or video representation held in computer memory in the possession, custody or control of the Maritime Administration.

In this request, the term “documents” means the following: all reports, lists, interagency memoranda, intra-agency memoranda, data correspondence, opinion letters, ledgers, studies, investigations, schedules, photographs, sound reproductions, ledger books, graphs, catalogues, statements or any other handwritten, typewritten, printed, recorded or graphic material of any kind or description whatsoever.

Please note that we are willing to pay the appropriate costs attributable to this request, and are also willing to make the necessary arrangements to remit fees as may be required. We need no prior notice of the amount of the costs or fees unless they exceed \$250.00. If estimated copying and search fees exceed \$250.00, please contact the undersigned before proceeding.

We are requesting that the Maritime Administration respond within twenty (20) business days of receipt of this request, as specified in 5 U.S.C. § 552(a)(6)(A).

If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the Act. Please also release all non-exempt portions of otherwise exempt material.

Please do not hesitate to contact the undersigned by phone at (713) 980-1715, or by email at jmuir@bakerwotring.com if you have any questions regarding this request.

Thank you for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read 'John Muir', with a long horizontal flourish extending to the right.

John Muir